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FILED U.S. DISTRICT COURT

SEALED : 02
DISTRICT OF UTAH

IN THE UNITED STATES DISTRICT COURT DISTRICT OF UTAH, NORTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

VS.

IVAN SANCHEZ (a/k/a IVAN SANCHEZ SAMBRANO, a/k/a ZANCHEZ SAMBRANO SANCHEZ, a/k/a IVAN SANCHEZ LAMAS)

Defendant.

Case: 1:18-cr-00107

Assigned To: Shelby, Robert J. Assign. Date: 12/19/2018

Descriptio

INDICTMENT

VIOLATION:

18 U.S.C. § 641 (Theft of Government Property)

The Grand Jury Charges:

COUNT I

18 U.S.C. § 641 (Theft of Government Property)

Beginning on or about November 14, 2008 and continuing through on or about May 12,

2018, in the Northern Division of the District of Utah and elsewhere,

IVAN SANCHEZ (a/k/a IVAN SANCHEZ SAMBRANO, a/k/a ZANCHEZ SAMBRANO SANCHEZ, a/k/a IVAN SANCHEZ LAMAS),

defendant herein, willfully and knowingly stole, purloined, and converted to his personal use property of the United States, specifically postal stamps from the United States Postal

Service, a department and agency of the United States, of a value exceeding \$1,000; all in violation of 18 U.S.C. § 641.

NOTICE OF INTENT TO SEEK FORFEITURE

Pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), upon conviction of any offense in violation of 18 U.S.C. § 641, as set forth above, the defendant shall forfeit to the United States of America any property, real or personal, which constitutes or is derived from proceeds traceable to such offenses. The property to be forfeited includes, but is not limited to, the following:

A money judgment of at least \$196,889.65, which is equal to the value of any property, real or personal, constituting or derived from proceeds traceable to the offenses and not available for forfeiture as a result of any act or omission of the defendant(s) for one or more of the reasons listed in 21 U.S.C. § 853(p).

SUBSTITUTE ASSETS

If any of the above-described forfeitable property, as a result of any act or omission of the defendants,

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third person;
- (3) has been placed beyond the jurisdiction of the court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c), to seek forfeiture of any other property of said defendants up to the value of the above-forfeitable property.

A TRUE BILL:

FOR PERSON OF GRAND JURY

JOHN W. HUBER United States Attorney

LAKE DISHMAN

Assistant United States Attorney